

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

ORDER NO. 95-015

AMENDING NPDES PERMITS FOR THE TWENTY-SEVEN DISCHARGERS CITED:

City of Benicia, City of Burlingame, Central Contra Costa Sanitary District, Central Marin Sanitation Agency, Delta Diablo Sanitation District, Dublin San Ramon Services District, East Bay Municipal Utility District, (Special District No. 1), Fairfield-Suisun Sewer District, City of Hayward, City of Livermore, City of Millbrae, Napa Sanitation District, Novato Sanitary District, Oro Loma/Castro Valley Sanitary District, City of Palo Alto, City of Petaluma, City of Richmond, City and County of San Francisco (Southeast Plant and Oceanside Treatment Facility), Cities of San Jose and Santa Clara, City of San Leandro, City of San Mateo, South Bayside System Authority, Cities of South San Francisco and San Bruno, City of Sunnyvale, Union Sanitary District, Vallejo Sanitation and Flood Control District and West County Wastewater District

The California Regional Water Quality Control Board, San Francisco Bay Region (hereinafter the Board), finds that:

1. The Publicly Owned Treatment Works (POTWs) listed below (hereinafter the Dischargers) have been previously issued National Pollutant Discharge Elimination System (NPDES) Permits in Board Order given below:

<u>DISCHARGER</u>	<u>NPDES PERMIT NO.</u>	<u>ORDER NO.</u>	<u>DATE ADOPTED</u>
Benicia, City of	CA0038091	94-094	8-17-94
Burlingame, City of	CA0037788	90-100	7-18-90
Central Contra Costa Sanitary District	CA0037648	89-170	11-15-89
Central Marin Sanitation Agency	CA0038628	91-003	1-16-91
Delta Diablo Sanitation District	CA0038547	93-142	11-19-93
Dublin San Ramon Services District	CA0037613	94-074	6-15-94
East Bay Municipal Utility District (Special District No. 1)	CA0037702	94-127	9-21-94
Fairfield-Suisun Sewer District	CA0038024	90-101	7-18-90
Hayward, City of	CA0037869	94-072	6-15-94
Livermore, City of	CA0038008	94-073	6-15-94
Millbrae, City of	CA0037532	94-048	4-20-94
Napa Sanitation District	CA0037575	94-037	3-16-94
Novato Sanitary District	CA0037958	92-091	8-19-92
Oro Loma/Castro Valley Sanitary District	CA0037869	94-072	6-15-94
Palo Alto, City of	CA0037834	93-085	7-21-93
Petaluma, City of	CA0037810	90-153	12-12-90
Richmond, City of	CA0038539	94-014	1-19-94

San Francisco, City and County of:		
Southeast Plant	CA0037664 94-149	10-19-94
Oceanside Treatment Facility	CA0037681 90-093	6-20-90
San Jose and Santa Clara, Cities of	CA0037842 93-117	10-20-93
San Leandro, City of	CA0037869 94-072	6-15-94
San Mateo, City of	CA0037541 89-179	11-15-89
South Bayside System Authority	CA0038369 93-066	7-21-93
South San Francisco and San Bruno, Cities of	CA0038130 92-034	4-15-92
Sunnyvale, City of	CA0037621 93-086	7-21-93
Union Sanitary District	CA0037869 94-072	6-15-94
Vallejo Sanitation and Flood Control District	CA0037699 88-153	10-19-88
West County Wastewater District	CA0038539 94-014	1-19-94

2. The United States Environmental Protection Agency (EPA) has promulgated regulations requiring POTWs which meet certain criteria to develop and implement local pretreatment programs. These criteria are as follows:
 - ~ POTWs with total design flows greater than five million gallons per day (mgd) and receive from Industrial Users pollutants which Pass Through or Interfere with the operation of the POTW;
 - ~ POTWs with smaller flows (5 mgd or less) which receive industrial waste which may interfere with treatment processes, contaminate sludge, cause violation of effluent limitations, or other circumstances which may cause Interference with the POTW or cause Pass Through of pollutants or cause POTW upsets.
3. The EPA formally delegated the Pretreatment Program to the State Water Resources Control Board (State Board) and the Regional Water Quality Control Boards on September 22, 1989. As of September 22, 1989, the Board is the Approval Authority and will be responsible for the review and approval of new and modified POTW Pretreatment Programs.
4. The Board adopted Order No. 89-179 on December 13, 1989. The Order required the cited POTWs to implement pretreatment programs in accordance with 40 Code of Federal Regulations (CFR) Part 403.
5. The Sewerage Agency of Southern Marin (SASM) had been determined to not meet the criteria of having to implement a local pretreatment program and was removed and deleted from having to maintain an approved pretreatment program in Order No. 89-179. This Order continues to find that SASM does not meet the requirements of having to develop and implement an approved pretreatment program.
6. On June 17, 1983, the North San Mateo County Sanitation District's (NSMCSD) Pretreatment Program received final approval by the EPA. By letter dated January 4, 1995, NSMCSD requested that its Pretreatment Program be removed from the Federal Pretreatment Program Requirements.

7. NSMCSD does not meet any of the criteria for requiring a pretreatment program. (See Finding 2.) The plant's permitted capacity is 8.0 mgd with a current dry weather flow of 5.75 mgd; however, there is no industrial discharge in the NSMCSD service area. All discharges to the District's plant are either residential or commercial flows that are similar in quality and quantity to residential discharges.
8. Based on the Findings of 6 & 7, the NSMCSD no longer meets the criteria required to develop and implement a pretreatment program. Therefore, the North San Mateo County Sanitation District has been deleted from this Order as having an Approved Pretreatment Program.
9. The City and County of San Francisco removed its Richmond-Sunset sewage treatment plant from service in September 1993 and replaced it with the newly constructed Oceanside Treatment Facility. The Northpoint Plant is no longer listed as a Discharger since this plant is a wet weather overflow facility.
10. The Board has notified the Dischargers and interested agencies and persons of its intent to amend the NPDES Permits and has provided them with an opportunity for a public hearing and to submit their written views and recommendations.
11. This Project is exempt from the provisions of Chapter 3 (commencing with Section 21100) of Division 13 of the Public Resources Code (California Environmental Quality Act) pursuant to Section 13389 of the California Water Code.
12. The Board, in a public meeting, heard and considered all comments pertaining to the discharges.

IT IS HEREBY ORDERED, pursuant to the provisions of Division 7 of the California Water Code and regulations adopted thereunder, and to the provisions of the Clean Water Act and regulations and guidelines adopted thereunder, that the Dischargers listed in Finding 1 shall comply with the following:

1. The Dischargers shall implement all pretreatment requirements contained in 40 CFR 403, as amended. The Dischargers shall be subject to enforcement actions, penalties, and fines as provided in the Clean Water Act (33 USC 1351 et seq.), as amended. The Dischargers shall implement and enforce their respective Approved Pretreatment Programs or modified Pretreatment Programs as directed by the Board's Executive Officer or the EPA. The EPA and/or the State may initiate enforcement action against an industrial user for noncompliance with applicable standards and requirements as provided in the Clean Water Act.
2. The Dischargers shall enforce the requirements promulgated under Sections 307(b), 307(c), 307(d), 307(e) and 402(b) of the Clean Water Act. The Dischargers shall cause industrial users subject to Federal Categorical Standards to achieve compliance no later than the date specified in those requirements or, in the case of a new industrial user, upon commencement of the discharge.

3. The Dischargers shall perform the pretreatment functions as required in 40 CFR Part 403 and amendments or modifications thereto including, but not limited to:
 - (1) Implement the necessary legal authorities to fully implement the pretreatment regulations as provided in 40 CFR 403.8(f)(1);
 - (2) Implement the programmatic functions as provided in 40 CFR 403.8(f)(2);
 - (3) Publish an annual list of industrial users in significant noncompliance as provided per 40 CFR 403.8(f)(2)(vii);
 - (4) Provide for the requisite funding and personnel to implement the pretreatment program as provided in 40 CFR 403(f)(3); and
 - (5) Enforce the national pretreatment standards for prohibited discharges and categorical standards as provided in 40 CFR 403.5 and 403.6, respectively.
4. The Dischargers shall submit annually a report to EPA Region 9, the State Board and the Regional Board describing the Dischargers' respective pretreatment program activities over the previous twelve months. In the event that the Discharger is not in compliance with any conditions or requirements of this permit, the Discharger shall also include the reasons for noncompliance and a plan and schedule for achieving compliance. The report shall contain, but not be limited to, the information specified in Appendix A entitled "Requirements for Pretreatment Annual Reports," which is made a part of this Order. The annual report is due on the last day of February each year. The Executive Officer may specify another due date on a case by case basis.
5. The Dischargers shall submit semiannual pretreatment reports to the EPA Region 9, the State Board and the Board describing the status of their respective significant industrial users (SIUs). (See Appendix A, page 3 for definition of SIU.) The report shall contain, but not be limited to, the information specified in Appendix B entitled, "Requirements for Semiannual Pretreatment Reports," which is made part of this Order. The semiannual reports are due July 30th (for the period January through June) and January 31st (for the period July through December) of each year. The Executive Officer may exempt a Discharger from the semiannual reporting requirements on a case by case basis subject to State Board and EPA's comment and approval.
6. The Dischargers may combine the annual pretreatment report as required in Provision 4 with the semiannual pretreatment report (for the July through December reporting period) as required in Provision 5. The combined report shall contain all of the information requested in Appendices A and B and will be due on January 31st.
7. The Dischargers shall conduct the monitoring of their respective treatment plants' influent, effluent and sludge as described in Appendix C entitled, "Requirements for Influent, Effluent and Sludge Monitoring," which is made part of this Order. The results of the sampling and analysis shall be submitted in the semiannual reports. A summary of the data shall be included in the annual report. The Executive Officer

may require more or less frequent monitoring on a case by case basis.

8. Order No. 89-179 is hereby rescinded.
9. This Order shall serve to amend the National Pollutant Discharge Elimination System Permits listed above pursuant to Section 402 of the Clean Water Act, or amendments thereto, and shall become effective ten days after the date of adoption provided the Regional Administrator of the United States Environmental Protection Agency has no objection. If the Regional Administrator objects to its issuance, this Order shall not become effective until such objection is withdrawn.
9. This Order expires on January 18, 2000.

I, Steven R. Ritchie, Executive Officer, do hereby certify the foregoing is a full, true and correct copy of an order adopted by the California Regional Water Quality Control Board, San Francisco Bay Region, on January 18, 1995.



Steven R. Ritchie
Executive Officer

Appendices:

- A: Requirements for Annual Pretreatment Reports
- B: Requirements for Semiannual Pretreatment Reports
- C: Requirements for Influent, Effluent and Sludge Monitoring

APPENDIX A

REQUIREMENTS FOR PRETREATMENT ANNUAL REPORTS

The Pretreatment Annual Report is due each year on the last day of February. [If the annual report is combined with the semiannual report (for the July through December period) the submittal deadline is January 31st.] The purpose of the Annual Report is 1) to describe the status of the Publicly Owned Treatment Works (POTW) pretreatment program and 2) to report on the effectiveness of the program, as given by the results of the preceding year's program implementation. The report shall contain at a minimum, but is not limited to, the following information:

1) Cover Sheet

The cover sheet must contain the name(s) and National Pollutant Discharge Elimination System (NPDES) permit number(s) of those plants which are part of the Pretreatment Program. Additionally, the cover sheet must include: the name, address and telephone number of a pretreatment contact person; the period covered in the report; the period covered in the previous report; a statement of truthfulness; and the dated signature of a principal executive officer, ranking elected official, or other duly authorized employee who is responsible for overall operation of the POTW (40 CFR 403.12(j)).

2) Introduction

The Introduction shall include any pertinent background information related to the District/City, the POTW and/or the Industrial base of the area. Also, this section shall include an update on the status of any Pretreatment Compliance Inspection (PCI) tasks, Pretreatment Performance Evaluation (PPE) tasks, Pretreatment Audit tasks, Cleanup and Abatement (CAO) tasks, or other pretreatment-related enforcement actions required by the Regional Board or the USEPA. A more specific discussion shall be included in the section entitled, "Program Changes."

3) Definitions

This section shall contain a list of all the terms and their definitions which the POTW uses to describe or characterize elements of the pretreatment program.

4) Discussion of Upset, Interference and Pass Through

This section shall include a discussion of Upset, Interference or Pass Through incidents, if any, at the POTW(s) which the Discharger knows of or suspects were caused by industrial discharges. Each incident shall be described at a minimum of the following information:

- a) a description of what occurred;
- b) a description of what was done to identify the source;
- c) the name and address of the IU responsible;
- d) the reason(s) why the incident occurred;

- e) a description of the corrective actions taken and
- f) an examination of the local and federal discharge limits and requirements for the purpose of determining whether any additional limits or changes to existing requirements may be necessary to prevent other Upset, Interference or Pass Through incidents.

5) Influent, Effluent and Sludge Monitoring Results

This section shall provide a summary of the analytical results from the "Influent, Effluent and Sludge Monitoring" as specified in Appendix C. The analytical laboratory reports are not required if they have already been provided in the semiannual pretreatment reports.

6) Inspection and Sampling Program

This section shall contain at a minimum, but is not limited to, the following information:

- a) Inspections: the number of inspections performed for each type of IU; the criteria for determining the frequency of inspections; the inspection format followed by the Industrial Waste Inspector;
- b) Sampling Events: the number of sampling events performed for each type of IU; the criteria for determining the frequency of sampling; the chain of custody procedures.

7) Enforcement Procedures

This section shall provide information as to when the approved Enforcement Response Plan (ERP) had been formally adopted. In addition, the date the finalized ERP was submitted to the Regional Board shall also be given.

8) Federal Categorical/Local Standards

This section shall contain a list of all of the federal categories which apply to the POTW. The specific category shall be listed including the subpart and 40 CFR section which applies. The maximum and average limits for each category must be listed as must any additional or more stringent local limits. This list shall indicate the number of Categorical Industrial Users (CIUs) per category.

9) Updated List of Regulated SIUs

This section shall contain a complete and updated list of the Discharger's Significant Industrial Users (SIUs), including their names and addresses. The list shall include all deletions and additions keyed to the list as submitted in the previous annual report. All deletions shall be briefly explained.

- a) **Organization:** The list of SIUs shall be organized in the following manner:
 - (1) Those SIUs regulated by Federal categorical standards shall be listed

by the category under which they fall. The specific category shall be listed including the subpart and 40 CFR section which applies.

- (2) Those SIUs that are classified as Significant noncategorical industries shall be listed separately.

b) **Inspection and Sampling Summary:** This section shall contain a summary of all the inspections and sampling activities conducted by the Discharger over the past year to gather information and data regarding the SIUs. The information and data used to determine the limits for those SIUs for which a combined waste stream formula was applied shall also be included. The summary shall include:

- (1) the number of inspections and sampling events conducted for each SIU;
- (2) the quarters in which these activities were conducted; and
- (3) the compliance status of each SIU, delineated by quarter, and characterized using all applicable descriptions as given below:
 - (a) in consistent compliance;
 - (b) in inconsistent compliance;
 - (c) in significant noncompliance;
 - (d) on a compliance schedule to achieve compliance, (include the date final compliance is required);
 - (e) not in compliance and not on a compliance schedule;
 - (f) compliance status unknown, and why not.

(c) **Enforcement Summary:** This section shall contain a summary of the compliance and enforcement activities during the past year. The summary shall include the names of all the SIUs affected by the following actions:

- (1) Warning letters or notices of violations regarding SIUs' apparent noncompliance with or violation of any federal pretreatment categorical standards and/or requirements, or local limits and/or requirements. For each notice, indicate whether it was for an infraction of a federal or local standard/limit or requirement.
- (2) Administrative Orders regarding the SIUs' apparent noncompliance with or violation of any federal pretreatment categorical standards and/or requirements, or local limits and/or requirements. For each notice, indicate whether it was for an infraction of a federal or local

standard/limit or requirement.

- (3) Civil actions regarding the SIUs' apparent noncompliance with or violation of any federal pretreatment categorical standards and/or requirements, or local limits and/or requirements. For each notice, indicate whether it was for an infraction of a federal or local standard/limit or requirement.
- (4) Criminal actions regarding the SIUs' apparent noncompliance with or violation of any federal pretreatment categorical standards and/or requirements, or local limits and/or requirements. For each notice, indicate whether it was for an infraction of a federal or local standard/limit or requirement.
- (5) Assessment of monetary penalties. Identify the amount of penalty in each case and the reason for assessing the penalty.
- (6) Order to restrict/suspend discharge to the POTW.
- (7) Order to disconnect the discharge from entering the POTW.

10) Baseline Monitoring Report Update

This section shall provide a list of CIUs that have been added to the pretreatment program since the last annual report. This list shall summarize the status of the respective Baseline Monitoring Reports (BMR). The BMR must contain all of the information specified in 40 CFR 403.12(b). For each of the new CIUs, the summary shall indicate when the BMR was due; when the CIU was notified by the POTW of this requirement; when the CIU submitted the report; and/or when the report is due.

11) Pretreatment Program Changes

This section shall contain a description of any significant changes in the Pretreatment Program during the past year including, but not limited to: legal authority, local limits, monitoring/inspection program and frequency, enforcement protocol, program's administrative structure, staffing level, resource requirements and funding mechanism. If any element(s) of the program is in the process of being modified, this intention shall also be indicated.

12) Pretreatment Program Budget

This section shall present the budget spent on the Pretreatment Program. The budget shall show the amounts spent on personnel, equipment, chemical analyses and any other appropriate categories. A discussion of the source(s) of funding shall be provided.

13) Public Participation Summary

This section shall include a copy of the public notice as required in 40 CFR 403.8(f)(2)(vii). If a notice was not published, the reason shall be stated.

14) Sludge Storage and Disposal Practice

This section shall have a description of how the treated sludge is stored and ultimately disposed. The sludge storage area, if one is used, shall be described in detail. Its location, a description of the containment features and the sludge handling procedures shall be included.

15) Other Subjects

Other information related to the Pretreatment Program which does not fit into one of the above categories shall be included in this section.

Signed copies of the reports shall be submitted to the Regional Administrator at USEPA, the State Water Resources Control Board and the Regional Board at the following addresses:

Regional Administrator
United States Environmental Protection Agency
Region 9, Mail Code W-5
75 Hawthorne Street
San Francisco, CA 94105

Pretreatment Program Manager
Regulatory Section
Division of Water Quality
State Water Resources Control Board
P.O. Box 944213
Sacramento, CA 94244-2130

Pretreatment Coordinator
Surface Water Protection Division
Regional Water Quality Control Board
2101 Webster Street, Suite 500
Oakland, CA 94612

APPENDIX B:

REQUIREMENTS FOR SEMIANNUAL PRETREATMENT REPORTS

The semiannual pretreatment reports are due on July 30th (for pretreatment program activities January through June) and January 31st (for pretreatment program activities July through December) of each year, unless an exception has been granted by the Board's Executive Officer. The semiannual reports are a consolidation of the previously required quarterly reporting with the submittal frequency reduced; however, the exact same information shall be submitted. The report shall contain, at a minimum, but is not limited to, the following information:

1. Influent, Effluent and Sludge Monitoring

The influent, effluent and sludge monitoring results shall be included in the report. The analytical laboratory report shall also be included, with the QA/QC data validation provided upon request. A description of the sampling procedures and a discussion of the results shall be given. (Please see Appendix C for specific detailed requirements.) The source(s) of parameters which exceed National Pollutant Discharge Elimination System (NPDES) limits shall be investigated and discussed. In addition, a brief discussion of the source(s) of all organic compounds identified shall be provided.

2. Industrial User Compliance Status

This section shall contain a list of all Significant Industrial Users (SIUs) which were not in consistent compliance with all pretreatment standards/limits or requirements for the reporting period (six months). The compliance status for the previous three quarters (or nine months) shall also be included. The SIU shall be reported until it has achieved consistent compliance for a total of six months or two quarters.

For each SIU on the list, the following information shall be provided:

- a. Indicate if the SIU is subject to Federal categorical standards; if so, specify the category including the subpart which applies.
- b. For SIUs subject to Federal Categorical Standards, indicate which parameters applied to the SIU are local limits more stringent than the Federal Categorical Standards.
- c. Indicate the compliance status of the SIU for the quarter
- d. For violations/noncompliance occurring in the reporting period, provide (1) the date(s) of the violation(s); (2) the parameters and corresponding concentrations exceeding the limits and the discharge limits for these parameters and (3) a brief summary of the noncompliant event(s) and the steps that are being taken to achieve compliance.

3. POTW's Compliance with Pretreatment Program Requirements

This section shall contain a discussion of the Discharger's compliance status with the Pretreatment Program Requirements as indicated in the latest Pretreatment Audit Report, Pretreatment Compliance Inspection (PCI) Report or Pretreatment Performance Evaluation (PPE) Report. It shall contain a summary of the following information:

- a. Date of the latest Audit, PCI or PPE and report.
- b. Date of the Discharger's response.
- c. List of unresolved issues.
- d. Plan and schedule for resolving the remaining issues.

If none of the three sections described above are applicable for the reporting period, at a minimum, the Discharger shall submit a letter stating that (1) all of the SIUs are and have been in compliance for the previous six months or two quarters, and (2) there are no outstanding program deficiencies as identified in the last audit , PCI or PPE report.

The reports shall be signed by a principal executive officer, ranking elected official, or other duly authorized employee who is responsible for overall operation of the Publicly Owned Treatment Works (POTW) (40 CFR 403.12(j)). Signed copies of the reports shall be submitted to the Regional Administrator at USEPA, the State Water Resources Control Board and the Regional Board at the following addresses:

Regional Administrator
United States Environmental Protection Agency
Region 9, Mail Code W-5
75 Hawthorne Street
San Francisco, CA 94105

Pretreatment Program Manager
Regulatory Section
Division of Water Quality
State Water Resources Control Board
P.O. Box 944213
Sacramento, CA 94244-2130

Pretreatment Coordinator
Surface Water Protection Division
Regional Water Quality Control Board
2101 Webster Street, Suite 500
Oakland, CA 94612

APPENDIX C

REQUIREMENTS FOR INFLUENT, EFFLUENT AND SLUDGE MONITORING

The Dischargers shall conduct sampling of their respective treatment plant's influent, effluent and sludge at the frequency as shown in Table 1 on Page 16.

The monitoring and reporting requirements of the POTWs' Pretreatment Program are in addition to those specified in the individual POTW's NPDES permit. Any subsequent modifications of the NPDES requirements shall be adhered to and shall not affect the requirements described in this Appendix unless written notice from the Regional Board is received. When sampling periods coincide, one set of test results, reported separately, may be used for those parameters which are required to be monitored in both the Discharger's NPDES permit and Pretreatment Program. Monitoring reports required by this Order shall be sent to the Pretreatment Coordinator.

Monitoring shall be conducted as follows:

I. Influent and Effluent Monitoring

The Dischargers shall monitor for the parameters using the required test methods stated in Table 1. EPA Methods 1624 and 1625 may be substituted for EPA Methods 624 and 625 respectively. EPA Method 1618 may be used for the analysis of EPA Method 614 parameters. Any other test method substitutions must have received prior written Regional Board approval. Unless instructed otherwise in writing, the Dischargers shall continue to monitor for those parameters. Influent and Effluent sampling locations shall be the same as those sites specified in the POTWs' Self Monitoring Programs as set forth in their respective NPDES permits.

The influent and effluent sampled should be taken during the same 24-hour period. All samples must be representative of daily operations. A minimum of four grab samples, one every six hours over a 24-hour period, must be used for volatile organic compounds (EPA Method 624), cyanide and phenol. These samples shall be composited at the analytical laboratory just prior to analysis. For all other pollutants, 24-hour composite samples must be obtained through flow-proportioned composite sampling.

Sampling and analysis shall be performed in accordance with the techniques prescribed in 40 CFR Part 136 and amendments thereto. In tests for volatile organic compounds and base/neutral and acid extractable organic compounds nonpriority pollutant peaks detected at or above 10 ug/l, based on the nearest internal standard, shall be identified and quantified (based on a purity of 80% or best fit value) and included in the test results. Detection limits, as listed in the attached Table 2 (page 17), shall be adhered to.

The following standardized report format should be used for submittal of the influent and effluent monitoring report. A similar structured format may be used

but will be subject to Regional Board approval. The monitoring reports shall be submitted with the Semiannual Reports.

- A. Sampling Procedures - This section shall include a brief discussion of the sample locations, collection times, how the sample was collected (i.e., direct collection using vials or bottles, or other types of collection using devices such as automatic samplers, buckets, or beakers), types of containers used, storage procedures and holding times. Include a description of prechlorination and chlorination/dechlorination practices during the sampling periods.
- B. Method of Sample Dechlorination - A brief description of the sample dechlorination method prior to analysis shall be provided.
- C. Sample Compositing - The manner in which samples are composited shall be described. If the compositing procedure is different from the test method specifications, a reason for the variation shall be provided.
- D. Data Validation - All quality assurance/quality control (QA/QC) methods to be used shall be discussed and summarized. These methods include, but are not limited to, spike samples, split samples, blanks and standards. Ways in which the QA/QC data will be used to qualify the analytical test results shall be identified. A certification statement shall be submitted with this discussion stating that the laboratory QA/QC validation data has been reviewed and has met the laboratory acceptance criteria. The QA/QA validation data shall be submitted to the Regional Board upon request.
- E. A tabulation of the test results, including detection limits, shall be provided.
- F. Discussion of Results - The report shall include a complete discussion of the test results. If any pollutants is detected in sufficient concentration to upset, interfere or pass through plant operations, the type of pollutant(s) and potential source(s) shall be noted, along with a plan of action to control, eliminate, and/or monitor the pollutant(s). The discussion shall also include a list of pollutants suspected in the influent based on review of the industrial waste sources, and the possible reasons for the absence of those pollutants in the influent and/or effluent. Any apparent generation and/or destruction of pollutants attributable to chlorination/dechlorination sampling and analysis practices shall be noted.

II. Sludge Monitoring

Sludge shall be sampled in the same 24-hour period during which the influent and effluent are sampled except as noted in (3) below. The same parameters required for influent and effluent analysis shall be included in the sludge analysis. The sludge analyzed shall be a composite sample of the sludge for final disposal consisting of:

1. Sludge lagoons - 20 grab samples collected at representative equidistant intervals (grid pattern) and composited as a single grab, or
2. Dried stockpile - 20 grab samples collected at various representative locations and depths and composited as a single grab, or
3. Dewatered sludge - daily composite of 4 representative grab samples each day for 5 days taken at equal intervals during the daily operating shift taken from a) the dewatering units or b) from each truckload, and shall be combined into a single 5-day composite.

The U.S. EPA manual POTW Sludge Sampling and Analysis Guidance Document, August 1989, containing detailed sampling protocols specific to sludge is recommended as a guidance for sampling procedures.

Required sludge analysis methods for those parameters not listed under Title 22 Section 66699 are the same as those required for influent and effluent testing. The use of EPA Methods 1624 and 1625 in lieu of EPA Methods 624 and 625 is acceptable and is recommended. EPA Method 1618 may be used for the analysis of EPA Method 614 parameters. The EPA manual Analytical Methods of the National Sewage Sludge Survey, September 1990, containing detailed analytical protocols specific to sludge, is recommended as a guidance for analysis methods. The analysis methods for substances listed under Title 22 Section 66699, which includes metals, must be one approved by both the EPA and the California Department of Health Services. Detection limits shall be as low as is achievable with reasonable interference levels. Cleanup procedures shall be employed as necessary. In accordance with Title 22 Section 66700 the Waste Extraction Test (WET), or other subsequently approved extraction method, shall be used if the total concentration of a metal parameter, or other parameters required for monitoring and listed, or subsequently listed, in Section 66699, is at least ten (10) times the Soluble Threshold Limit Concentration (TTLC) and below the Total Threshold Concentration Limit (TTLC) for that parameter. Should the concentration (in mg/l) of a Section 66699 parameter exceed the STLC value using the WET procedure, or should the total concentration (in mg/kg) of such a parameter exceed its TTLC value, the sludge shall be classified as a hazardous waste under Title 22 of the California Code of Regulations and shall be treated as such. Title 22 Sections 66693 to 66699 and all amendments thereto must be adhered to.

Sludge monitoring reports shall be submitted with the appropriate Semiannual Report. The following standardized report format should be used for submittal of the report. A similarly structured form may be used but will be subject to Regional Board approval.

- A. Sampling procedures - Include sample locations, collection procedures, types of containers used, storage/refrigeration methods, compositing techniques and holding times. Enclose a map of sample locations if sludge lagoons or stockpiled sludge is sampled.
- B. Data Validation - All quality assurance/quality control (QA/QC) methods to be used shall be discussed and summarized. These methods include, but are not limited to, spike samples, split samples, blanks and standards. Ways in which the QA/QC data

will be used to qualify the analytical test results shall be identified. A certification statement shall be submitted with this discussion stating that the laboratory QA/QC validation data has been reviewed and has met the laboratory acceptance criteria. The QA/QC validation data shall be submitted to the Regional Board upon request.

- C. Test Results - Tabulate the test results and include the detection limits and TTLC values.
- D. Discussion of Results - The report shall include a complete discussion of test results. If the detected pollutant(s) is reasonably deemed to have an adverse effect on sludge disposal, a plan of action to control, eliminate, and/or monitor the pollutant(s) and the known or potential source(s) shall be included. The discussion shall also include a list of pollutants suspected in the influent based on review of the industrial waste sources and the possible reasons for the absence of those pollutants in the sludge. Any apparent generation and/or destruction of pollutants attributable to chlorination/dechlorination sampling and analysis practices shall be noted.

The Discharger shall also provide any influent, effluent or sludge monitoring data for nonpriority pollutants which the permittee believes may be causing or contributing to Interference, Pass Through or adversely impacting sludge quality

Table 1: Required Monitoring Frequencies and Test Methods for POTWs with Approved Pretreatment Programs

POTW	Influent and Effluent					Sludge
	VOC	BNA	O-Pest	C-Pest	Metals	
EPA Method	624	625	614	632	AA*	
Benicia	SA	SA			Q	SA
Burlingame	SA	SA			Q	SA
Central Contra Costa SD	Q	Q	SA	SA	M	SA
Central Marin SA	SA	A			M	SA
Delta Diablo SD	SA	SA			M	SA
Dublin San Ramon SD	SA	SA			M	SA
East Bay MUD	Q	Q			M	SA
Fairfield-Suisun SD	SA	SA			M	SA
Hayward	SA	SA			M	SA
Livermore	SA	SA			M	SA
Millbrae	SA	SA			Q	SA
Napa SD	SA	SA	SA	SA	M	SA
Novato SD	SA	SA			M	A**
Oro Loma/Castro Valley SD	SA	SA			M	SA
Palo Alto	SA	SA			M	SA
Petaluma	SA	SA		SA	M	SA
Richmond	SA	SA			M	SA***
San Francisco	Q	Q			M	SA
San Jose/Santa Clara	SA	SA			M	SA
San Leandro	SA	SA			M	SA
San Mateo	SA	SA			M	SA
South Bayside SA	SA	SA			M	SA
South SF and San Bruno	SA	SA			M	SA
Sunnyvale	SA	SA			M	SA
Union SD	SA	SA			M	SA
Vallejo SFCD	SA	SA			M	SA
West County WWD	SA	SA	SA	SA	M	A**

VOC = volatile organic compounds

BNA = base/neutral and acid extractable organic compounds

O-Pest = organophosphorus pesticides

C-Pest = carbamate and urea pesticides

* = approved analytical methods from 40 CFR Part 136 except as provided under the Sludge Monitoring section of this document

** = Sampling performed during April through September only. For West County WWD, two sludge samples are to be taken: one on the sludge prior to mixing with Richmond's sludge and one on the combined sludge from Richmond and West County

*** = Sludge sampling shall be performed on Richmond's sludge prior to mixing with West County's sludge

M = monthly sampling

Q = quarterly sampling

SA = semiannual sampling

A = annual sampling

Table 2: Required Detection Limits for Influent and Effluent Parameters

Parameter	Test Method	Detection Limit*
Volatile Organic Compounds	EPA 624	1 ug/l
Base/Neutral and Acid Extractable Organic Compounds	EPA 625	1 ug/l
Organophosphorus Pesticides	EPA 614	0.1 ug/l
Carbamate and Urea Pesticides	EPA 632	0.1 ug/l
Trace Metals (arsenic, cadmium, chromium, copper, lead, mercury, nickel, silver, zinc and selenium)	EPA approved	As stated in the Discharger's Self-Monitoring Program
* EPA method detection limits for some organic compounds and pesticides may be higher than listed. The detection limits for these compounds and pesticides shall be determined by the stated detection limits in the appropriate test method.		